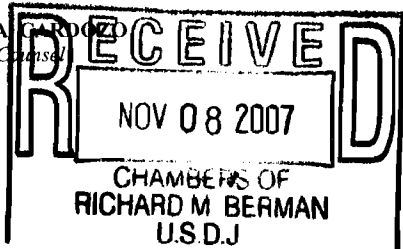




MEMO ENDORSED
p.2

MICHAEL A. GAROZZO
Corporation Counsel



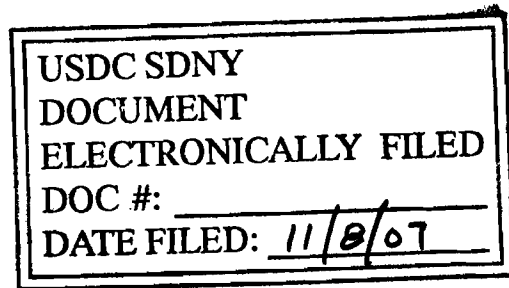
THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

SABRINA TANN
Phone: (212) 442-8600
Fax: (212) 788-9776
stann@law.nyc.gov

November 7, 2007

BY HAND DELIVERY

Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl St., Room 650
New York, New York 10007



Re: Maria Paulino a.k.a. Maria Delosangeles v. City of New York, et al., 07 CV 9233 (RMB)¹

Your Honor:

As the Assistant Corporation Counsel assigned to the defense of the above-referenced civil rights action, I write to respectfully request that defendants Raymond Kelly and the City of New York's time to answer or otherwise respond to the complaint in this action be enlarged sixty (60) days from November 8, 2007 to and including January 8, 2007. Defendants also respectfully request that the Court adjourn the initial conference scheduled for November 29, 2007 at 9:30 a.m. until a date after defendants respond to the complaint that is convenient for the Court. I have conferred with plaintiff's counsel, Heriberto A. Cabrera, Esq., and he consents to this request for an initial enlargement of time and an adjournment of the initial conference.

As background, the complaint alleges, *inter alia*, that on August 29, 2006, several unidentified New York City police officers falsely arrested and subsequently maliciously prosecuted plaintiff in violation of her state and federal civil rights. As a threshold matter, an enlargement of time will allow this office to forward to plaintiff for execution authorizations for

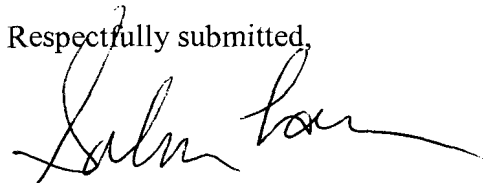
¹ This case has been assigned to Assistant Corporation Counsel Katherine E. Smith, who is presently awaiting admission to the bar and is handling this matter under supervision. Ms. Smith may be reached directly at (212) 513-0462.

the release of the underlying arrest, criminal prosecution and medical records. Defendants cannot obtain these records without the authorizations, and without the records, defendants cannot properly assess this case or respond to the complaint. Accordingly, defendants requires this enlargement so that they can obtain the underlying documentation, properly investigate the allegations of the amended complaint and fulfill their obligations under Rule 11 of the Federal Rules of Civil Procedure.

No previous request for an enlargement of time has been made. Accordingly, defendants Raymond Kelly and City of New York respectfully request that their time to answer or otherwise respond to the complaint be enlarged to sixty (60) days from November 8, 2007 to and including January 8, 2007 and that the initial conference scheduled for November 29, 2007 at 9:30 a.m. be adjourned until a date after defendants respond to the complaint that is convenient for the court.


I thank Your Honor for considering the within requests.

Respectfully submitted,



Sabrina Tann (ST 2552)
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Heriberto A. Cabrera
5615 5th Ave.
Brooklyn, NY 11220
Fax: (718)-439-1452
(By Facsimile)

APPLICATION GRANTED. CONFERENCE	
ADJOURNED TO 1/9/08 AT 2:30 P.M.	
SO ORDERED:	
Date: 11/8/07	
Richard M. Berman, U.S.D.J.	